

1 Paul S. Padda
NV Bar No. 10417
2 Joshua Y. Ang
NV Bar No. 14026
3 PAUL PADDA LAW, PLLC
4560 South Decatur Blvd., Suite 300
4 Las Vegas, NV 89103
Tel: 702.366.1888
5 psp@paulpaddalaw.com
ja@paulpaddalaw.com

6 Additional co-counsel listed on signature page

7 ATTORNEYS FOR PLAINTIFF AND THE
8 PROPOSED CLASSES

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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Kathleen Bliss, on behalf of herself, the
14 Proposed Nationwide Rule 23 Class, and the
Proposed Nevada Subclass,

15 Plaintiff,

16 v.

17 CoreCivic, Inc.,

18 Defendant.

Case No. 2:18-cv-01280-JAD-GWF

**STIPULATION TO EXTEND
PLAINTIFF'S TIME TO FILE
RESPONSE TO DEFENDANT'S
RENEWED MOTION TO STAY
DISCOVERY PENDING RESOLUTION
OF DISPOSITIVE MOTIONS**

(First Request)

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21 Plaintiff Kathleen Bliss ("Plaintiff") and Defendant CoreCivic, Inc. ("CoreCivic"), through
22 counsel, stipulate pursuant to LR IA 6-1 and LR 7-1 to extend Plaintiff's deadline to respond to
23 Defendant's Renewed Motion to Stay Discovery Pending Resolution of Dispositive Motions (ECF
24 No. 60) ("the Motion" or "Defendant's Motion"). Defendant filed the Motion on January 25, 2019.
25 The deadline for Plaintiff's response, without this extension, is February 8, 2019. The parties
26 stipulate for Plaintiff's response deadline to be extended to February 15, 2019. This is the first
27 stipulation for the extension of Plaintiff's deadline to respond to Defendant's Motion.

28 There exists good cause to approve the parties' stipulation and extend Plaintiff's response

1 deadline. Plaintiff's response to Defendant's Motion for Summary Judgment (ECF No. 59) is
2 already due on February 15, 2019. Plaintiff's response to Defendant's Motion will necessarily have
3 to consider Defendant's Motion for Summary Judgment, as well, so it is sensible for both responses
4 to be filed on the same day.

5 As such, Plaintiff respectfully requests, and the parties stipulate, that Plaintiff's deadline to
6 respond to Defendant's Motion be extended to February 15, 2019.

7 DATED this 31st day of January 2019.

8 STRUCK LOVE BOJANOWSKI & ACEDO, PLC

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10 By /s/Ashlee B. Hesman

Jacob B. Lee
Ashlee B. Hesman
3100 West Ray Road, Suite 300
Chandler, AZ 85226
jlee@strucklove.com
ahesman@strucklove.com

11
12
13
14 Gina G. Winspear
DENNETT WINSPEAR
3301 North Buffalo Dr., Suite 195
Las Vegas, NV 89129
gwinspear@dennettwinspear.com

15
16
17 Attorneys for Defendant CoreCivic, Inc.

By /s/Charles A. Delbridge

Anna P. Prakash*
Matthew H. Morgan*
Charles A. Delbridge*
NICHOLS KASTER, PLLP
4600 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
aprakash@nka.com
morgan@nka.com
cdelbridge@nka.com

Michael Hodgson*
THE HODGSON LAW FIRM, LLC
3699 SW Pryor Road
Lee's Summit, MO 64082
mike@thehodgsonlawfirm.com

Lance D. Sandage*
SANDAGE LAW, LLC
1600 Genessee Street, Suite 655
Kansas City, MO 64102
lance@sandagelaw.com

Joseph K. Eischens*
LAW OFFICE OF JOSEPH K. EISCHENS
8013 Park Ridge Drive
Parkville, MO 64152

Paul S. Padda
Joshua Y. Ang
PAUL PADDALAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, NV 89103
psp@paulpaddalaw.com
ja@paulpaddalaw.com

*Admitted pro hac vice

Attorneys for Plaintiff and the Proposed Classes

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 2/01/2019

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Anna Purna Prakash aprakash@nka.com
Ashlee Hesman ahesman@strucklove.com, tgation@strucklove.com
Charles Delbridge cdelbridge@nka.com
Daniel Struck dstruck@strucklove.com, swolford@strucklove.com
Gina Winspear gwinspear@dennettwinspear.com, msarnoski@dennettwinspear.com, ptimmons@dennettwinspear.com, cmiller@dennettwinspear.com, tamendola@dennettwinspear.com
Jacob B. Lee jlee@strucklove.com, arowley@strucklove.com, rlove@strucklove.com
Joseph Kenneth Eischens joe@jkemediation.com
Joshua Y. Ang ja@paulpaddalaw.com, maryg@paulpaddalaw.com, mcl@paulpaddalaw.com, psp@paulpaddalaw.com, rlc@paulpaddalaw.com
Lance David Sandage lance@sandagelaw.com
Matthew Hale Morgan morgan@nka.com, assistant@nka.com
Michael Hodgson mike@thehodgsonlawfirm.com
Paul S. Padda psp@paulpaddalaw.com, amy@paulpaddalaw.com, ja@paulpaddalaw.com, maryg@paulpaddalaw.com, mcl@paulpaddalaw.com

/s/Charles A. Delbridge

Charles A. Delbridge